

September 16, 2013

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for 60 days
SEP 18 2013
William J. Dwyer
COMPETITION POLICY DIVISION
WIRELINE COMPETITION BUREAU

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20544

**RE: Request of Internet Solver, Inc. and Alliance Connect, LLC for
Special Temporary Authority to Permit Internet Solver, Inc. to
Continue Operating Pending the Approval of a Domestic and
International Transfer of Control Application; WC Dkt. 13-223**

Dear Ms. Dortch:

Internet Solver, Inc. ("Internet Solver") and Alliance Connect, LLC ("ACL") (collectively the "Applicants"), through undersigned counsel and pursuant to Section 214 of the Communications Act, as amended, 47 U.S.C. § 214, and Sections 63.04 and 63.24 of the Commission's Rules, 47 C.F.R. §§ 63.04, 63.24, respectfully request Special Temporary Authority ("STA") to allow Internet Solver to continue to provide service to customers pending Commission approval of the parties' Joint Application for consent to the assignment of all of the assets of Internet Solver to ACL that are related to Internet Solver's business as a competitive local exchange carrier. A copy of the Joint Application is attached hereto. Because Internet Solver is already providing services to domestic customers, the Applicants respectfully request that the Commission grant this STA request as soon as possible.

As discussed in the Application, Internet Solver is a holder of domestic 214 "blanket" authorization and international 214 authorization.¹ ACL provides land-line local exchange telecommunications services as a competitive local exchange carrier in Iowa in the service territories of the following ILECs: CenturyLink (Qwest), Frontier, and Windstream. ACL is a wholly-owned subsidiary of Alliance Technologies, Inc. ("ATI"). ATI is owned by Iowa Network Services, Inc., ("INS") an Iowa corporation, and Mr. Steve Sikkink. INS is owned by many rural ILECs, none of which holds an ownership and/or voting interest of 10 percent or more in INS.

On June 1, 2013, ATI acquired substantially all of the assets of Internet Solver, including Internet Solver's licenses, authorizations, customer accounts and receivables, customer and vendor

¹ On November 3, 2006, Internet Solver received an International Section 214 authorization for authority to provide global or limited global resale service. ITC-214-20061013-00469. Applicants are filing with the International Bureau an application to assign/transfer control of the International 214 authorization. Internet Solver is not currently providing international services.

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contracts and agreements equipment and intellectual property. Under the Asset Purchase Agreement, Internet Solver will continue to have sole responsibility for providing service to customers, billing and collecting payment from customers and responding to customer inquiries and complaints until approval of the transaction by the Iowa Utilities Board. Upon receipt of all regulatory approvals, ATI will transfer all of the acquired assets to its wholly-owned subsidiary, ACL.

Applicants' failure to obtain Commission approval for the transfer of control was inadvertent. Applicants were not aware of their obligation under the Communications Act and the Commission's rules to obtain approval for the proposed transaction until consulting with Regulatory Counsel. It is also important to note that under the terms of the transaction, Internet Solver continues in existence and all of Internet Solver's contracts and activities under its authorizations from the FCC and the Iowa Utilities Board continue to be provided by Internet Solver, and will continue to be provided by Internet Solver until all approvals from the Iowa Utilities Board have been obtained. Internet Solver will therefore in actual practice continue to provide all of the Commission regulated services until all of the regulatory approvals have been obtained. There has not, therefore, in actual practice been a transfer of the physical activities governed by the Commission. The Applicants have been forthcoming about the facts of this transaction, and regret any inconvenience this filing may cause the Commission or its staff.

Grant of this STA request will serve the public interest. It will allow Internet Solver to provide uninterrupted telecommunications services during the pendency of the assignment application before the FCC, thereby avoiding the loss of vital communications services by its customers. Further, as described more fully in the assignment application, allowing Internet Solvers to continue operations until such time as the application is approved will promote competition in the domestic and international communications services marketplace. ACL will be able to provide Internet Solver's customers with additional and advanced telecommunications services that will enhance the services they already receive. Finally, grant of the instant request will allow Applicants to come into compliance, and begin the formal wind-down process for Internet Solver, thereby reducing the administrative burden on the Commission.

The Applicants acknowledge that grant of this STA request will not prejudice any action the Commission might take on the Joint Application, and the STA may be revoked by the Commission on its own motion and without a hearing. Applicants further acknowledge that grant of this STA request and the Joint Application will not preclude enforcement action.

Please contact the undersigned at (703) 714-1319 if you have any questions or require additional information.

Respectfully submitted,



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